

Lebensmittelrechtliche Konformitätserklärung

Für unseren Artikel:

OPP-Zuschnitte 12x18cm 20my im Spenderkarton a 8000 Blatt

mit der folgenden Artikel-Nummer:

12322

Hiermit bestätigen wir auf der Grundlage der uns vorliegenden Lebensmittelunbedenklichkeits-erklärung des Produzenten, dass die von uns oben genannten Artikel für den Kontakt mit Lebensmitteln geeignet sind und den dafür vorgesehenen Gesetzen sowie Richtlinien entsprechen.

Zum eigenen Schutz unserer Lieferquellen sind Vorlieferant und Untersuchungslabor sowie dritte beteiligte Personen unkenntlich gemacht. Die uns vorliegende Originalerklärung kann den zuständigen Behörden auf Verlangen zur Verfügung gestellt werden.

Unsere Bestätigung setzt voraus, dass der Packstoff sachgemäß weiterverarbeitet wird. Die spezielle Eignung dieses Packstoffes kann nur vom sachkundigen Füllguterzeuger oder Abpacker beurteilt werden.

Diese Konformitätserklärung ersetzt zuvor ausgestellte Konformitätserklärungen und besitzt eine allgemeine Gültigkeit ab Ausstellungsdatum bzw. bis zur Änderung der Gesetzeslage.

Göttingen, den 14.05.2025

Nette GmbH
Göttingen
[Handwritten Signature]

Lebensmittelunbedenklichkeitserklärung des Lieferanten:

ANFANG LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

BS
BSP/G

PRODUCT MANUFACTURER

The products BS and BSP/G are manufactured by [REDACTED] BOPP [REDACTED].

GOOD MANUFACTURING PRACTICES (GMP)

The manufacturing of these products has been done in regards to requirements on Good Manufacturing Practices as defined by the framework Regulation 1935/2004/EC and "GMP" Regulation 2023/2006/EC as amended.

STATEMENT OF COMPLIANCE WITH FOOD CONTACT REGULATIONS

We confirm that the composition of these products complies with the following Legislations, Recommendations or Communications for the production of food packaging:

Italy

"Decreto Ministeriale del 21/03/1973 and amendments.

European Union

"Regulation 1935/2004" of the European Parliament and Council of 27 October 2004.

"Regulation 10/2011" of the European Commission of 14 January 2011 as amended.

The 15th amendment of Reg.EU 10/2011 lays down new requirements for plastic materials and articles intended to come into contact with food, at every stage of the manufacturing chain.

The compliance with this amendment concerns the following evaluation:

Identification and amount of substances, in the intermediate material, that are subject to restrictions in Annex II, or for which genotoxicity has not been ruled out, and which originate from an intentional use during a manufacturing stage of that intermediate material and which could be present in an amount that foreseeably gives rise to a migration from the final material exceeding 0,00015 mg/kg food or food simulant;

Disclosure of identity and concentration of substances in the intermediate material which are listed in Annex II of the regulation with a restriction, including also non-intentionally added substances (NIAS), like for example impurities.

According to the recipe, the Safety Data Sheets and the information shared by our suppliers of raw materials, we can declare that:

- There are no potentially genotoxic substances derived from an intentional use during a manufacturing stage.

All the monomers and additives used to produce the components of our product are listed in Annex I of the Regulation 10/2011 as amended.

The overall migration measured on this product is under the limit of 10 mg/dm² (Surface/Volume Ratio = 8 dm²/ml) specified by Regulation 10/2011/EC and subsequent amendments.

The level of migration has been measured according to the rules specified in Regulation 10/2011/EC, Annex III and Annex V, using the following simulants/test conditions:

Food Simulant	Testing Conditions
A, Ethanol 10% (v/v)	10 days, 60°C
B, Acetic acid 3% (p/v)	10 days, 60°C
D2, Oil	10 days, 60°C

For the following additives a SML is established in Regulation 10/2011/EC:

Ref. No	Restrictions
39090	SML (T) = 1,2 mg/Kg (expressed as tertiary amine)
39120	SML (T) = 1.2 mg/Kg expressed as tertiary amine excluding HCl

The level of migration has been measured according to the rules specified in Regulation 10/2011/EC, Annex III and Annex V, using the following simulants/test conditions:

Food Simulant	Testing Conditions
Isooctane	10 days, 60°C

Ref. No	Restrictions
21130	SML = 6 mg/Kg

The level of migration has been measured according to the rules specified In Regulation 10/2011/EC, Annex III and Annex V, using the following simulants/test conditions:

Food Simulant	Testing Conditions
H ₂ O	10 days, 60°C

The specific migration measured on this product for the aforementioned additives is under their limits (surface volume ratio 8 dm²/l) specified by Regulation 10/2011/EC.

Additives with Specific Migration Limits Annex I Table 1

List of additives in the product with specific migration limit, for which it is not necessary to perform migration tests (based on “worst case” calculation, assuming a surface ratio of 6 dm² of film per 1 Kg of food):

Ref. No	Restrictions
83595	SML = 18 mg/Kg
68320	SML = 6 mg/Kg
92560	SML = 18 mg/Kg
95360	SML = 5 mg/Kg
39815	SML = 0.05 mg/kg
19960	SML (T) = 30 mg/kg expressed as maleic acid
34690	SML = 1 mg/kg expressed as Al

List of additives which are also authorized as food additives, sweeteners, colours and flavourings (dual use additives; ref. Regulation 1333/2008 and amendments):

E-nr	Ref. nr	Restrictions
E471	56486	No SML
E330		No SML
E470a		No SML
E470b		No SML
E551		No SML
E570- FL08.15	24550-89040	No SML
E173		SML= 1 mg/Kg

List of salts allowed in accordance with Article 6(3)(a) and that are listed in Annex II Table 1:

E-nr / Ref. nr	Restrictions
Calcium	No SML
Magnesium	No SML

However, the amount of these substances in the film is too low so even in the worst case of a 100% migration, this limit can't be exceeded. No further analysis is required for this film according to art. 18 par. 3 of the Regulation 10/2011/EC.

Restrictions on plastic materials and articles Annex II Table 1

The specific migration measured on this product for the below mentioned substances is under their limits (surface volume ratio 8 dm²/l) specified by Regulation 10/2011/EC:

Substance	Restrictions
Aluminum	SML = 1 mg/Kg
Antimony	SML = 0.04 mg/Kg
Arsenic	ND
Barium	SML = 1 mg/Kg
Cadmium	ND
Chromium	ND
Cobalt	SML = 0.05 mg/Kg
Copper	SML = 5 mg/Kg
Iron	SML = 48 mg/Kg
Lead	ND
Lithium	SML = 0.6 mg/Kg
Manganese	SML = 0.6 mg/Kg
Mercury	ND
Nickel	SML = 0.02 mg/Kg
Zinc	SML = 5 mg/kg

The level of migration has been measured according to the rules specified In Regulation 10/2011/EC, Annex III and Annex V, using the following simulants/test conditions:

Food Simulant	Testing Conditions
B, Acetic acid 3% (p/v)	10 days, 60°C

According to these results the product is suitable for contact with all food types at room temperature or below including hot-fill conditions and/or heating up to $70\text{ }^{\circ}\text{C} \leq T \leq 100\text{ }^{\circ}\text{C}$ for maximum $t = 120/2^{((T-70)/10)}$ minutes, where use of food simulants A, B and D2 is expected.

We remind You that the overall/specific migration shall be measured on the finished articles using the actual foodstuff or the appropriate food simulant at the real food/temperature conditions of use, according to the rules specified in Regulation 10/2011/EC as amended.

NIAS STATEMENT

We have carried out semi-quantitative analysis in order to identify and evaluate the risk associated to the presence of “non intentionally added substances” present in the formulation of sample of the above-mentioned product, which are representative of the industrial campaign.

The aforementioned screening has concerned:

Evaluation of volatile substances (through GC-MS analysis, and the sample previously conditioned 30 minutes at 125°C); detectable limit used 0,10 mg/m².

Evaluation of non-volatile substances (through GC-MS analysis, and the sample previously treated in ultrasonic bath for 30 minutes); detectable limit used 1 mg/Kg.

The NIAS screening has identified the presence of the following non-volatile substances:

Substance	CAS Number	Notes
Isopropyl Myristate	110-27-0	
(Z)-docos-13-enamide (Erucamide)	112-84-5	This substance is included in the Union List taken from Annex I of the Commission Regulation (EU) No10/2011, identified by Reference Number 52720
9-octadecenitrile, (Z)-	112-91-4	
7,9-di-tert-butyl-1-oxaspiro(4,5) deca-6,9-diene-2,8-dione	82304-66-3	
Oleamide (9-Octadecenamide)	301-02-0	Some data submitters indicate they consider this substance as Skin sensitizing. This substance is included in the Union List taken from Annex I of the Commission Regulation (EU) No10/2011, identified by Reference Number 68960
Phenol, 2,4-bis(1,1-dimethylethyl)-phosphite (3:1)	31570-04-4	Under assessment as Persistent, Bioaccumulative and Toxic (PBT). However, this substance is included in the Union List taken from Annex I of the Commission Regulation (EU) No10/2011, identified by Reference Number 74240
Tris (2,4-di-tertbutylphenyl) phosphate	95906-11-9	

The NIAS screening of volatile substances, on the other hand, has not identified any other substance in amount greater than the detectable limit.

This information applies to the material as it leaves [REDACTED] production facilities.

The information in this document is, to our knowledge, true and accurate at the time and date of issue.

Due to possible changes in the laws and regulations, or other reasons, we cannot guarantee that the status of this product will remain unchanged.

Our certificate does not cover:

- Any modification of the warranted products by any addition of any other product to it;
- Any prejudicial modification of the warranted products resulting from a processing of the product;
- An inadequate use and/or storage of the material and of the finished articles;

The present declaration is to be considered valid for both standard and ISCC certified films.

The data and information presented herein are to the best of our knowledge accurate and reliable. The company assumes no responsibility, express or implied, for use of said data and information.

[REDACTED]
[REDACTED]
[REDACTED]
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